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MEMORANDUM

TO: R. Michael Bort, RFW  
FROM: Paul Hess, WCC  
DATE: November 25, 1987  
PROJECT: REM II - EPA Contract No. 68-01-6939  
DOCUMENT NO.: 130-RI1-IO-FMWD-1  
SUBJECT: Technical Review of the Skinner Landfill Phase I RI Report  
Dated November 1987

My remarks will be directed at the report's shortcomings with respect to content, structure and procedures. The following comments are to be noted. The LOE hour time restraint for this technical review did not allow for an in-depth review of the report's facts, figures and calculations.

1. The report generally lacks information source references.
2. There is a lack of background information on regional as well as local demographics, climate, land use, geology, hydrology and hydrogeology.
3. The report lacks a section describing field activities as defined by the site's Work Plan.
4. The report does not establish the site related chemicals and their known concentrations (known on-site hazardous waste characteristics) from leachate or intrusive analytical investigation.
5. The report does not identify the potential population at risk or the media that may be impacted.
6. The report does not outline a procedure for screening the analytical data for use in establishing the site related contaminants.
7. The report does not clearly establish indicator chemicals that are to be used to evaluate the various media and their impact.
8. The present analytical tables should be developed into new tables that reflect the media background values.
9. The analytical data tables should list each parameter's detection limits.

10. Background values for the various parameters are not well developed in the report's discussion or tables for each media. The analytical data collected at different periods of time cannot be co-mingled without first screening out the meaningless variables below background values and the removal of field and lab suspected contaminants.
11. This report infers that limited new data from the Phase II activities will be co-mingled with Phase I data. The Phase I data should be re-evaluated before more samples are collected. An adequate number of background samples should be collected for each media under study in order to establish a meaningful range of values and/or statistical methodology for establishing background values. Then the identified impact areas of the site (downgradient) should be sampled.

PH/td

To: R. Michael Bout, Watson  
From: W. Borchardt, EDM.  
Date: 11/24/87

My first and biggest question is why is this site on the NPL? It is somewhat apparent that its because of a groundwater threat due to whom and how many people come here, the city of Laramie, Inc.? Also, what placed this site on the NPL, ~~obviously~~ not so obviously it was a green dot or release dictated by the E&E FIT team, correct?

#### Additional Comments:

- (1) Section 2 deals with the Geologic/hydrogeologic investigation, but there is no discussion, however brief, dedicated to the hydrogeologic investigation. Are both strata's year-round or intermittent? If they convey 1CC, CCC cfs or 25-ccfs (estimable) are they of the gradient 1 ft/mile, 1 ft/10 miles, 1 ft/½ mi., etc.
- (2) When discussing GW contamination, point out which wells are up "gradient" / background.
- (3) Why is NOTHING stated regarding, even briefly, about inorganic contaminants, if nothing was detected, say so.
- (4) The sample tables are nice but the report will read significantly better if only the Summary tables and presented in the text, while the others are placed in an appendix.
- (5) On all sample location maps, the sites should be indicated somehow (~~shaded~~, solid line, etc.) to fit quite disturbing when you have to flip back to the figure to remember where things are.
- (6) In several sections throughout the report, recommendations are made for Phase II activities, where they don't belong. However, when Section 7 is finally reached, none of these previously stated recommendations appear.
- (7) While not discussing Section 7, this report is about this thick, and several thousands of dollars have spent, along

with hundreds of man-hours, and yet you can't develop any conclusions except more work is needed? What happened to all the data that was collected during Phase I?

Another recommendation you should add to phase II is to develop a relationship between the G.W. and Surface Water.

### General Comments

The Background discussion is missing a lot of information,

o demographics - densely/sparsely populated, etc.

o topography - flat, gently rolling, greatly dissected, etc.

o better site history - primarily better phrasing, the 1<sup>st</sup>

four ~~the~~ sentences jump, not in chronological order, from 40-50  
ybp, to disposal practices, to present day, to 23 years ago.

etc.

The discussions on analytical results are more #'s oriented rather than interpretation.

### Finally

As I understand it, this or these types of documents are going to be used, in part, by the general public, and should be written as such. By not making any conclusions what-so-ever, is the reader to make his/her ~~own~~ own interpretations on geology, hydrogeology, contamination, etc.?